Nokia Mobile Phones (USA) Inc.
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FCC ID : GMLNSD-5FX
FRN : 0006-3590-95

Subject : Nokia responses to ATCB comments of February 26, 2002

Comments numbered 1) through 6) have been addressed by PCTest and they have modified the test report accordingly, the test report has been uploaded to the ATCB server.
Comment number 7) has been forwarded to our SAR lab in Oulu and their response was that they cannot change the cover since the testing was already performed according to IEEE P1528. We believe that IEEE P1528 encompasses the relevant information of OET Bulletin 65 supplement C, and since it is more comprehensive it should represent worst case SAR levels.
Comment number 8), there is only one battery used for this product, but there was a typographical error in the User Guide that referred to "batteries" instead of "battery", that has been corrected and the new User Guide has been uploaded to the ATCB server.
Comment number 9), the term "Expanded Uncertainty" is more appropriate and will be used future reports.
Comment number 10), although the SAR scans of this report do not have the liquid temperature listed, the temperature was monitored and in future reports we should list the temperature of the liquid for every scan during the SAR test.
Comment number 11) implies the test was done in local mode, but the test was performed using a base station simulator. Due to this and other factors such as liquid settling and battery capacity it is difficult to control the drift to less than +.14 dB to -.22 dB during a 20 minute SAR scan. We choose to submit the data with the existing drift since the SAR values could easily pass the FCC limit even if the .22 dB drift were added to the worst case SAR values.
Comment number 12), the Samv4.0 was used for the SAR test, the number "1" listed on the SAR scans is an internal Nokia reference for the SAR lab which has several Samv4.0 phantoms, and each Samv4.0 has a different number so that the lab can document which of their phantoms was used for the various tests.
Comment number 13), the belt clip warning has been added to the User Guide and can be seen on page 109, the seperation distance to the body is indicated in the photo of the body SAR test using the flat phantom, in the SAR report. On page 109 of the User Guide, the user is told to place the phone in the specific belt clip that has been tested for compliance when carrying the phone while it is on.
Comment 14) states that no data is presented using the headset, however the body SAR measurement was done exclusively with the headset because the phone can not be used on the body without the headset.
Comment 15) states that the reported SAR values should be stated in the manual. The worst case SAR values are listed on page 108 of the User Guide.